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**Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals**

**Sub-Committee of Experts on the Transport of Dangerous Goods**

**Forty-fifth session**
Geneva, 23 June – 2 July 2014
Item 2 (d) of the provisional agenda
**Explosives and related matters: review of packing instructions for explosives**

# Review of packing instructions for explosives

**Transmitted by the Sporting Arms & Ammunition Manufacturers' Institute (SAAMI)**[1]

## Introduction

1. At the forty-third session of the Sub-Committee, SAAMI submitted ST/SG/AC.10/C.3/2013/18. SAAMI sought a clarifying amendment that when metal packagings are not allowed by PP48, packaging components representing a minimal percentage of the overall package can still be metal. The intent was to allow light weight lids of sheet metal on plastic packages for UN 0509. The discussion was summarized in the report of the Working Group on Explosives in paragraph 12 of informal document INF.61/Rev.1. The working group agreed with the proposal in principle.

2. While discussing the SAAMI proposal to adopt a specific solution, an inconsistency was noted between the English and French languages in packing instruction 114(b), specifically that plastic was allowed in the French edition but not in the English edition. As the biennium was continuing, it was decided to postpone action until the inconsistency could be studied and resolved. The Sub-Committee's summary appears in paragraph 25 of the report, ST/SG/AC.10/C.3/86: "SAAMI will return with a proposal at the forty-fifth session. The Sub-Committee agreed that the English text of P114(b) should be corrected to allow the use of plastics receptacles as inner packagings (see annex III).", and in Annex III

[1] In accordance with the programme of work of the Sub-Committee for 2013–2014 approved by the Committee at its twenty-sixth session (see ST/SG/AC.10/C.3/84, para. 86 and ST/SG/AC.10/40, para. 14).

"Chapter 4.1, 4.1.4.1, P114 (b), under "Inner packagings", "Receptacles" – Insert "Plastics"."

3. The discovery of the inconsistency led the Chair and members of the Working Group on Explosives to study and compare the packing instructions. This has resulted in the identification and proposed resolution of sixteen additional differences between the French and English language versions, mostly in favour of the French edition. For efficiency, SAAMI is including all the suggested changes in this current proposal.

## Discussion

4. Based on discussion in the Working Group on Explosives, SAAMI amends its original proposal so that, instead of a new packing provision, it will now add one additional sentence to PP48 in packing instruction 114(b). The entire packing provision would now read: "PP 48: For UN Nos. 0508 and 0509, metal packagings shall not be used. Packagings of other material with a small amount of metal, for example metal closures, are not considered metal packagings."

5. It appears that similar changes to the two other packing instructions which use PP48, i.e. P112(c) and P406, would also be in order to keep the regulations consistent.

6. A table of the inconsistencies identified in the packing instructions follows:

| *Packing Instruction:* | *Applies to Type of Product & Affected UN Nos.* | *Difference & Analysis:* |
|---|---|---|
| P112(a) | Detonating solids (Solid, wetted, 1.1D) | 'Bags, plastics' as inner packagings are mentioned in the French version but not in the English |
| | 0004, 0072, 0076, 0078, 0118, 0133, 0146, 0150, 0151, 0154, 0214, 0215, 0219, 0220, 0226, 0266, 0282, 0340, 0391, 0394, 0401 | ▪ "Bags, plastics" appears in 15th Rev. but not in 16th Rev. |
| | | ▪ No changes to P112(a) were noted in ST/SG/AC.10/36/Add.1, so removal appears unintentional. |
| | | ▪ The English version should be amended accordingly. |
| P114(a) | Deflagrating solids (Solid, wetted) | "Bags, textile" as inner packagings are mentioned in the French version but not in the English |
| | 0077, 0132, 0234, 0235, 0236, 0342 | ▪ "Bags, textile" appears in 16th Rev. but not in 17th Rev. |
| | | ▪ No changes to P114(a) affecting "Bags, textile" were noted in ST/SG/AC.10/38/Add.1, so removal appears unintentional. |
| | | ▪ The English version should be amended accordingly. |

| *Packing Instruction:* | *Applies to Type of Product & Affected UN Nos.* | *Difference & Analysis:* |
|---|---|---|
| | | "Bags, textile, plastics coated or lined" as intermediate packagings are mentioned in the French version but not in the English<br>▪ "Bags, textile, plastics coated or lined" appears in 16th Rev. But not in 17th Rev.<br>▪ No changes to P114(a) affecting "Bags, textile, plastics coated or lined" were noted in ST/SG/AC.10/38/Add.1, so removal appears unintentional.<br>▪ The English version should be amended accordingly. |
| P116 | Blasting explosives<br><br>0077, 0132, 0234, 0235, 0236, 0342 | "Receptacles, wood, sift-proof" as inner packagings are mentioned in the French version but not in the English<br>▪ "Receptacles, wood, sift-proof" appears in 16th Rev. but not in 17th Rev.<br>▪ No changes to P114(a) affecting "Receptacles, wood, sift-proof" were noted in ST/SG/AC.10/38/Add.1, so removal appears unintentional.<br>▪ The English version should be amended accordingly.<br><br>A line break should be inserted in the French version of P116 between "en papier, resistant à l'eau" and "en papier parafiné" for "Feuilles" as "Emballages intérieurs"<br>▪ This error predates 14th Rev. It is obviously an unintentional error in formatting.<br>▪ The French version should be amended accordingly. |
| P131 | Detonators (electric/ non-electric/ assemblies)<br><br>0029, 0030, 0255, 0267, 0360, 0361, 0455, 0456, 0500 | The word "Receptacles" (in bold print) should be inserted between the words 'plastics' and 'fibreboard' in the column Inner packagings under the heading "Bags"<br>▪ The sub-heading "Receptacles" appears in 16th Rev. but not in 17th Rev.<br>▪ No changes to P131 affecting the sub-heading "Receptacles" were noted in ST/SG/AC.10/38/Add.1, so removal appears unintentional. |

| *Packing Instruction:* | *Applies to Type of Product & Affected UN Nos.* | *Difference & Analysis:* |
|---|---|---|
| | | In the column Outer packagings move the line "plastics, solid (4H2)" to the last line of Boxes (to be consistent with the rest of the instructions)<br>▪ 4H2 added in 18th Rev. by ST/SG/AC.10/40/Add.1. Positioning within the list was not specified. |
| P134 | Cartridges (oil well and power device) + cable cutters + fracturing/release / sounding devices + explosive rivets<br><br>0070, 0099, 0173, 0174, 0204, 0275, 0276, 0277, 0278, 0296, 0323, 0374, 0375, 0381 | "Receptacles, fibreboard" as inner packagings are mentioned in the French version but not in the English<br>▪ "Receptacles, fibreboard" appears in 16th Rev. but not in 17th Rev.<br>▪ No changes to P134 affecting "Receptacles, fibreboard" were noted in ST/SG/AC.10/38/Add.1, so removal appears unintentional.<br>▪ The English version should be amended accordingly. |
| P135 | Pyrotechnic articles<br><br>0049, 0050, 0054, 0092, 0093, 0191, 0192, 0193, 0194, 0195, 0196, 0197, 0312, 0313, 0333, 0334, 0335, 0336, 0337, 0373, 0403, 0404, 0405, 0418, 0419, 0420, 0421, 0428, 0429, 0430, 0431, 0432, 0487, 0492, 0493, 0503, 0505, 0506, 0507 | The word "Receptacles" (in bold print) should be inserted between the words "plastics' and 'fibreboard" in the column Inner packagings under the heading "Bags"<br>▪ The sub-heading "Receptacles" appears in 16th Rev. But not in 17th Rev.<br>▪ No changes to P135 affecting the sub-heading "Receptacles" were noted in ST/SG/AC.10/38/Add.1, so removal appears unintentional. |
| P136 | Cases, cartridge, empty + cases, combustible, empty<br><br>0055, 0379, 0446, 0447 | The word "Boxes" (in bold print) should be inserted between the words "textile" and "fibreboard" in the column Inner packagings under the heading "Bags"<br>▪ The sub-heading "Boxes" appears in 16th Rev. but not in 17th Rev.<br>▪ No changes to P136 affecting the sub-heading "Boxes" were noted in ST/SG/AC.10/38/Add.1, so removal appears unintentional.<br>Change the word "portions" to "partitions" in the column of Inner packagings<br>▪ The notation was moved from P136 "additional requirements" in the 11th Rev. to P136 "inner packagings" in the 12th Rev. When the move occurred, the word "Partitions" inadvertently became "portions". |

| *Packing Instruction:* | *Applies to Type of Product & Affected UN Nos.* | *Difference & Analysis:* |
|---|---|---|
| P137 | Charges, shaped + charges, explosive, commercial<br><br>0059, 0439, 0440, 0441, 0442, 0443, 0444, 0445 | In the column Outer packagings move the line "plastics, solid (4H2)" to the last line of Boxes (to be consistent with the rest of the instructions)<br><br>▪ 4H2 added in 18th Rev. by ST/SG/AC.10/40/Add.1. Positioning within the list was not specified. |
| P139 | Cord, detonating<br><br>0065, 0102, 0104, 0289, 0290 | 'Receptacles, fibreboard' as inner packagings are mentioned in the French version but not in the English<br><br>▪ "Receptacles, fibreboard" appears in 16th Rev. but not in 17th Rev.<br><br>▪ No changes to P139 affecting "Receptacles, fibreboard" were noted in ST/SG/AC.10/38/Add.1, so removal appears unintentional.<br><br>▪ The English version should be amended accordingly.<br><br>Under "Sheets", "paper" is mentioned in the English version where the French version specifies "paper, kraft"<br><br>▪ The English version as far back as the 11th Rev has simply stated "paper". "Kraft paper" is more specific, but there appears to be no need for that specificity.<br><br>▪ The French version should be amended accordingly to delete "kraft". |
| P143 | Charges, propelling<br><br>0271, 0272, 0415, 0491 | ▪ "Trays, fitted with dividing partitions, wood" as inner packagings are mentioned in the French version but not in the English<br><br>▪ "Trays, fitted with dividing partitions, wood" appears in 16th Rev. But not in 17th Rev.<br><br>▪ No changes to P143 affecting "Trays, fitted with dividing partitions, wood" were noted in ST/SG/AC.10/38/Add.1, so removal appears unintentional.<br><br>▪ The English version should be amended accordingly. |

| *Packing Instruction:* | *Applies to Type of Product & Affected UN Nos.* | *Difference & Analysis:* |
|---|---|---|
| P144 | Contrivances, water activated<br><br>0248, 0249 | "Receptacles, plastics" as inner packagings are mentioned in the French version but not in the English<br><br>▪ "Receptacles, plastics" appears in 16th Rev. But not in 17th Rev.<br><br>▪ "Receptacles, wood" were added as inner packagings in the 17th Rev, but no changes to P144 affecting "Receptacles, plastics" were noted in ST/SG/AC.10/38/Add.1, so removal appears unintentional.<br><br>▪ The English version should be amended accordingly. |

7. SAAMI notes with appreciation the work of the Chair of the Explosives Working Group, Belgium, IME and other members who made contributions to this proposal.

## Proposal

8. Modify packing provision 48 in packing instruction 114(b) to read:

"PP 48: For UN Nos. 0508 and 0509, metal packagings shall not be used. Packagings of other material with a small amount of metal, for example metal closures, are not considered metal packagings."

9. For P112(c) and P406, also add the same second sentence to PP48. "...Packagings of other material with a small amount of metal, for example metal closures, are not considered metal packagings."

10. Modify the packing instructions as follows:

In the English Edition, in the order of the French Edition:

10a) In P112(a) – under the heading "Inner packagings", under the sub-heading "Bags", insert "plastics" above "textile"

10b) In P114(a) – under the heading "Inner packagings", under the sub-heading "Bags", insert "textile" above "woven plastics"

10c) In P114(a) – under the heading "Intermediate packagings", under the sub-heading "Bags", insert "textile, plastics coated or lined" below "plastics"

10d) In P116 – under the heading "Inner packagings", under the sub-heading "Receptacles", insert "wood, sift-proof" below "plastics"

10e) In P131 – under the heading "Inner packagings", under the sub-heading "Bags", the sub-heading "Receptacles" is missing and should be inserted in bold print between the words "plastics" and "fibreboard"

10f) In P131 - under the heading "Outer packagings", under the sub-heading "Boxes", move the line "plastics, solid (4H2)" to the bottom of the list (to be consistent with the rest of the instructions)

10g) In P134 – under the heading "Inner packagings", under the sub-heading "Receptacles", insert "fibreboard" above "metal"

10h) In P135 – under the heading "Inner packagings", under the sub-heading "Bags", the sub-heading "Receptacles" is missing and should be inserted in bold print between the words "plastics" and "fibreboard"

10i) In P136 – under the heading "Inner packagings", under the sub-heading "Bags", the sub-heading "Boxes" is missing and should be inserted in bold print between the words "textile" and "fibreboard"

10j) In P136, under the heading "Inner packagings", change the word "portions" to "partitions"

10k) In P137, under the heading "Outer packagings", under the heading "Boxes", move the line "plastics, solid (4H2)" to the last line, to be consistent with the rest of the instructions

10l) In P139, under the heading "Inner packagings", under the sub-heading "Receptacles", insert "fibreboard" above "metal"

10m) In P143, under the heading "Inner packagings", under the sub-heading "Trays, fitted with dividing partitions, insert "wood" below "plastics"

10n) In P144, under the heading "Inner packagings", under the sub-heading "Receptacles", insert "plastics" between "metal" and "wood"

In the French Edition:

10o) In P116 – under the heading "Emballages intérieurs" (Inner packagings), under the sub-heading "Feuilles" (Sheets), a line break should be inserted between the two entries "en papier, resistant à l'eau" and "en papier parafiné"

10p) In P139, under the heading "Emballages intérieurs" (Inner packagings), under the sub-heading "Feuilles" (Sheets), change "en papier, kraft" to "en papier" (from "paper, kraft" to "paper")